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August 22, 2022

VIA ECF

The Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: G.A. and M.J.A. obo R.A. v. DOE, et. al., 21-CV-4551 (CM)

Your Honor:

I am a Senior Counsel in the Office of the New York Corporation Counsel and the attorney assigned to replace former counsel Copatrick Thomas in the above referenced matter. I submit this status report on behalf of the parties with the consent of counsel for Plaintiffs Elisa Hyman and respectfully request that the parties be able to submit a further status report to the Court on settlement by September 22, 2022.

The undersigned is in the process of gathering the complete underlying documentation from the client agency to be able to provide a fulsome up-to-date service accounting to Ms. Hyman, so that counsel may provide a settlement demand to the undersigned. The undersigned is cognizant of the Court's order from July 5, 2022 that "I want you to settle this case but if you can't get it done by September, we litigate" (Dkt. 29) and it is the undersigned's intention to work in good faith with counsel for Plaintiffs to settle this matter. However, as stated above, the undersigned would respectfully request until September 22, 2022 to be able to provide a further status report to the Court on settlement, prior to engaging in discovery. While there has been some delay due to the transition in counsel, the parties are on track and jointly committed to settlement without

having to engage in expensive discovery, and we hope that the Court will take the transition into consideration and give the parties this brief extension.

I thank the Court for its time and consideration of the herein matter.

Respectfully submitted,

Kimberly Joyce /s/

Kimberly Joyce

MEMO ENDORSED
8/23/2022

Okay. Granted. 8/23/2022

Colleen M. Hall